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March 31, 2006

The National Organic Standards Board  
c/o Valerie Frances  
Room 4008 – South Building  
1400 and Independence Avenue, SW  
Washington, D.C. 20250-0001

Re: NOSB Aquaculture Working Group Interim Final Report

Dear Ms. Frances:

I am an Aquaculture Extension Educator with the University of Idaho. As a member of the original aquaculture working group from 2000 and a contributor to the May 2005 NOAWG white paper I have been working with aquaculture producers, aquaculture trade associations, academia, USDA, and others for the past six years to help develop a national organic aquaculture standard. I appreciate the opportunity to offer comments on the NOSB – Aquaculture Working Group Interim Final Report.

I support the development of a national organic aquaculture standard. Such a program will provide an opportunity for domestic aquaculture producers to compete with foreign imports of aquaculture products certified as organic and to assure U.S. consumers of a credible standard. Although a majority of respondents in a national survey of consumer attitudes toward organic aquaculture products indicated they would purchase such products if provided the opportunity, a majority also cited a lack of credible standards as a reason for not purchasing organic aquaculture products.

Having reviewed the Interim Final Report I believe the report provides a reasonably clear understanding of the unique requirements that must be met to comply with organic production and handling standards to achieve organic certification. In addition, while this program is not suitable for all aquaculture producers I believe the requirements are such that those that want to achieve organic certification have a reasonable chance of doing so.

Following are specific comments for consideration:

- Dietary requirements of aquatic animals differ substantially compared to terrestrial livestock. These particular dietary requirements vary with aquatic animal species and life stage. Most fish require some amount of animal protein in their diet. The organic program needs to recognize the innate differences between aquatic animals and terrestrial livestock, and not defer to standards established for terrestrial livestock. To ensure adequate health and a nutritionally complete diet, organic standards should not limit fish meal and fish oil at artificial levels which deviate greatly from the biological requirements of the animal. I support Option A which allows the certification of wild fish, under certain conditions, for the production of fish meal and fish oil to be used as feed ingredients in organic aquaculture feeds.
- While terrestrial livestock are well-suited for low densities, a common misperception is that this also applies to fish. Many fish species require higher densities to prevent the breakdown of the normal social structure which results in aggressive and territorial behavior leading to stress, injuries and death. An artificial density limit is not an indicator of fish health. The overall health of fish is best determined by the appearance, growth rate, and feeding behavior of the fish.
- Current science does not support the prohibition of ice slurry as a method of slaughter for coldwater fish. The question whether fish feel pain or are sentient has not been resolved and is being actively debated within the science community.
- The language of item (f) in section §205.255 is difficult to understand. In addition, effluent water quality limits should be based upon local water quality standards which consider the assimilative capacity of the receiving water when establishing the standards.
- The language of item (a) in section §205.251 needs clarification as to what is meant by 'whichever is greater.' Is it weight or time?
- Triploids occur naturally in some fish species, including rainbow trout. Triploids are not genetically modified organisms and the use of polyploidy plants is allowed for organic crop production. Triploid rainbow trout are often used as a conservation measure. The use of triploid fish produced through temperature shock should be considered.

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I urge the National Organic Standards Board to pursue the establishment of a national organic aquaculture standard.

Sincerely,

A handwritten signature in black ink, appearing to read "G. Fornshell". The signature is fluid and cursive, with a large initial "G" and a stylized "F".

Gary Fornshell  
Aquaculture Extension Educator